

directly to workers affected by layoffs, and programs to assist UI claimants identified as unlikely to return to their previous occupations reattach to the workforce.

Local and Regional Incentive grants emphasizing coordination and integration of services, particularly to the business customer

Support and enhancement of technology infrastructure, LAVOS, and workforce information in order to better serve business and job seeker customers with improved labor market information products, including geocoding data, additional self service functions, strengthen case management and reporting components, and improved connectivity with other MIS systems to reduce duplication and reduce costs.

Supplement LWIA Adult and Youth program funding as needed, particularly in areas with high concentrations of out of school youth or areas experiencing significant lay offs.

Administration of the Workforce Investment System.

C. Waivers in place or planned

Louisiana has submitted the following waiver requests. The rationale, justification, and implementation of each waiver request is included in the related section of the plan. The State Workforce Commission has approved these waivers. They are included in the state plan public hearing. LDOL firmly believes that the approval of these waivers will enhance the state's ability to move in USDOL's national strategic direction.

1. Streamline Delivery of Adult/Dislocated Worker Services through the One-Stop System by enrolling participants in WIA Title I at point of receiving Intensive services and enrolling all participants receiving Core services in Wagner Peyser.
Citation: WIA §134(d), 20 CFR §662.240, 20 CFR §663.105
2. Allow use of Eligible Training Provider System (ETPL) for Older and Out-of-School Youth
Citation: WIA §123, WIA §134(d)(4), 20 CFR §661.305(a)(3), 20 CFR §664.510
3. Allow Supportive Services, including incentive payments, to be provided to adults/dislocated workers during follow-up and maybe allow adult needs related payments for intensive services like adult education services
Citation: WIA §101(46), 20 CFR §663.800
4. Change the required 50% employer match for customized training to a match based on a sliding scale.
Citation: WIA §101(8)
5. Youth Eligibility: (1) self attestation for family income, (2) accept eligibility from other programs such as Job Corp, Youth Challenge, CSBG and (3) raise 5% window to 25% with multiple barriers)
Citation: WIA §101(13), 20 CFR §664.200, 20 CFR §664.215
6. An exemption from the competitive requirement for the follow-up and supportive service elements and inclusion of these elements in the design framework of youth service

Citation: WIA §123, 20 CFR §664.405(a)(4), 20 CFR §661.305(3)

7. Make Youth Council Membership Requirements Optional
Citation: WIA §117(h), 20 CFR §661.305(b), 20 CFR §661.335(a), 20 CFR §664.100
8. Only 1 representative of partners on LWIBs, also one representative from each of other required entities
Citation: WIA §117(b), 20 CFR §661.315(a)
9. 100% Transfer between Adult and Dislocated Worker Programs
Citation: WIA §133(b)(4), 20 CFR §667.140
10. 20% Transfer between Adult and Youth Program
Citation: WIA §133(b)(4), 20 CFR §667.140
11. Redistribution of Recaptured Local Funds
Citation: WIA §133(c), WIA §128(c), 20 CFR §667.160
12. Expanded Use of Funds for Employment and Training by LWIAs to include State Level Activities
Citation: WIA §189, 20 CFR §661.420

D. How state measures success of its strategies in achieving its goals and how will use this data to improve system.

1. Describe the state's performance accountability system

The State performance accountability system focuses on the 17 required WIA measures. The current 17 measures are difficult to explain to business, therefore the state has been reluctant to add additional State measures to this already complicated process. Louisiana will implement the common measures in PY05. These measures are more conducive to development of a demand driven integrated system.

LDOL is working with LSU to develop a regression model for use in adjusting local performance measures based on demographic and local economic factors. It will be tested during PY05. If successful will be used to renegotiate PY06 performance levels. Until that is developed, the state has lacked a valid and reliable method for adjusting local standards. Currently each local area is held to the State negotiated level for the 17 measures. Local WIBs have the option to request adjustments to any measures excluding customer satisfaction (customer satisfaction is excluded since it should not be impacted by extraneous variables). A request must be accompanied by data that supports the request.

Generally, Louisiana has performed well on the 17 required measures. The Older Youth Earning Gain and Younger Youth Diploma Rate have been the most difficult for the LWIAs to meet. Louisiana has received an incentive award for the past three years.

Much of northern Louisiana is rural farm country. Limiting the earnings gain to wage records negatively impacts these areas that may not have covered wages. Louisiana has an extensive follow-up system designed to assist staff track services provided to youth and adults entering

**STATE OF LOUISIANA
WAIVER REQUEST
WORKFORCE INVESTMENT ACT**

Allow up to 20% Transfer of WIA Title I Allocation between Adult and Youth Programs

The Louisiana Department of Labor (LDOL), Office of Workforce Development (OWD), the State administrative entity for the Workforce Investment Act (WIA), is requesting a waiver to allow LWIAs to transfer up to 20% of their allocation between the Adult and Youth Programs. The waiver would allow LWIAs to better coordinate and manage programs by allowing the Boards to move funds between programs as needed, up to 20% of allocation, to better meet the employment and training needs of the citizens in their communities. Should the waiver be granted, LDOL would be able to ensure that the critical workforce needs of local communities are met.

This waiver request follows the format identified in WIA Section 189(i)(4)(B) and WIA Regulations 661.420(c).

Statutory Regulations to be Waived: WIA§133(b)(4), 20 CFR §667.140

A. Goals to be Achieved by the Waiver:

- Provide better coordination of WIA Title I Adult and Youth programs.
- Provide needed flexibility to design and fund programs that meet the needs of local communities
- Provide more useful program management.

B. State or Local Statutory or Regulatory Barriers:

There are not existing state or local statutory or regulatory barriers to the successful implementation of this waiver request.

C. Description of the Goals of the Waiver and Expected Outcomes:

Louisiana is requesting a waiver to allow LWIBs to transfer up to 20% of their allocation between the adult and youth programs. This will provide Louisiana with additional flexibility to develop the appropriate mix of services needed by the population in each LIWA. As the system moves to serve more out-of-school youth, this will help the LWIBs develop strategies to better match funding with the different customer groups. If a LWIA has a large number of OSY in need of training, adult funding may be the appropriate mechanism. If the OSY in a LWIA need assistance to return to alternative education, mentoring and skill development, youth funding would be a more appropriate mechanism. As each LWIB realigns services to meet USDOL's new strategic vision for youth, this waiver will assist the area implement their strategic

vision. LDOL will develop policy regarding allowable circumstances under which this transfer would be allowed and for what services transferred funds could be used.

D. Monitoring/Evaluation Process

The Louisiana Department of Labor (LDOL) is the State administrative entity for the Workforce Investment Act, the Wagner Peyser Act, Veterans Programs and Trade Act. LDOL will monitor the implementation and impact of the waiver, as well as progress toward expected outcomes, through a combination of performance reporting from the local level, and discussion with stakeholders and the Louisiana Workforce Commission. State oversight and evaluation will make effective use of these means to identify obstacles and address them. The State will review applicable policies and procedures and modify them accordingly.

E. Process the Notice of Local Boards and Opportunity to Comment:

LDOL actively sought the input local Boards during the development of the waiver request. The waiver request was presented to the Workforce Commission for comment and approval during the April meeting.

**STATE OF LOUISIANA
WAIVER REQUEST
WORKFORCE INVESTMENT ACT**

Streamline and Integrate the Delivery of Adult/Dislocated Worker Services through the One-Stop System by integrating the enrollment of participants in the One-Stop system by enrolling all participants receiving Core services in Wagner Peyser and beginning the enrollment process in WIA Title I at the point of receiving Intensive services for those individuals not able to find employment through core services.

The Louisiana Department of Labor (LDOL), Office of Workforce Development (OWD), the State administrative entity for the Workforce Investment Act (WIA), is requesting a waiver of the current process of reporting core services for both Wagner Peyser and WIA in order to fully integrate these programs and avoid duplication of services. The waiver would allow LDOL to better coordinate and manage programs and encourage more program integration. Should the waiver be granted, LDOL would be able to ensure that the critical workforce needs of local communities are met.

This waiver request follows the format identified in WIA Section 189(i)(4)(B) and WIA Regulations 661.420(c).

A. Statutory Regulations to be Waived: WIA §134(d), 20 CFR §662.240, 20 CFR §663.105

B. Goals to be Achieved by the Waiver:

- Provide better integration of USDOL funded programs in the one-stop system
- Provide for a simplified and streamlined performance management system.
- Provide for integrated system-wide performance accountability.
- Provide commonality across workforce development programs by having all participants follow single process.
- Reduce paperwork and labor costs associated with data collection.
- Provide clear and understandable information to Congressional and legislative leaders and the general public concerning the use of public funds and return on investment.
- Provide more useful program management.
- Provide for customer-driven instead of program-driven outcomes.
- Provide for better service coordination and information sharing among programs.

C. State or Local Statutory or Regulatory Barriers:

There are not existing state or local statutory or regulatory barriers to the successful implementation of this waiver request.

D. Description of the Goals of the Waiver and Expected Outcomes:

All staff working in the customer service section of the One-Stop Center share costs through the Memorandum of Understanding and Cost Allocation Plan. This integrated staff assists job seeker customers using one-stop services to look for employment and begin to make career decisions. All of these participants must be enrolled and included in Wagner Peyser and/or WIA performance standards. Louisiana is requesting a waiver of the requirement that WIA Title I provide core services separate from and duplicative of those provided by Wagner Peyser to the same participants. Numerous activities are defined as both Wagner Peyser staff assisted/staff facilitated services and WIA Core services. In the past, determining which One-Stop customers are registered and included in Wagner Peyser performance standards and which customers receive WIA Core Services and are enrolled and included in WIA performance standards could not be clearly differentiated. Staff working in the one-stop provide system core services and are not identified by program. It is impossible to determine which program to enroll a participant receiving basic core services in based on which program is paying the staff salary. If two 20 year olds were to come into a One-Stop and be served by two staff persons would the individual served by Wagner Peyser staff automatically receive services while the individual assisted by WIA staff have to provide income documentation and show low income status while they were both receiving the same exact core service. If a participant receives core services in the One-Stop Center and requires additional WIA services to become job ready, WIA must record another core service duplicative of what was already provided by Wagner Peyser before providing the intensive services.

In order to fully integrate USDOL funded programs in a single work process, Louisiana is requesting that all one-stop customers who receive staff assisted/staff facilitated core services in the one stop be included in the Wagner Peyser performance measures and only those individuals who can not find employment following initial assessment, workforce information, and placement assistance be referred to possibly begin the enrollment process in WIA at the point of Intensive/training services, not requiring a second duplicative core service. Those participants would be co-enrolled in both programs and counted in both sets of performance measures. All participants will be tracked through the common measures (core through WP and intensive/training through WIA). This will ensure participant process uniformity throughout the state. This approach matches the data collection process outlined in EMILE and the goals outlined in WIA reauthorization. In

addition it will assist WP and WIA coordinate and integration services to all customers, avoid duplication, streamline costs, and provide all job seekers in the one stop system a clearer path toward training in high growth high demand occupations. Furthermore, it will assist Louisiana as it develops a demand driven system and further integrates services by enhancing consistency in policy and service delivery across programs.

E. Monitoring/Evaluation Process

The Louisiana Department of Labor (LDOL) is the State administrative entity for the Workforce Investment Act, the Wagner Peyser Act, Veterans Programs and Trade Act. LDOL will monitor the implementation and impact of the waiver, as well as progress toward expected outcomes, through a combination of performance reporting from the local level, and discussion with stakeholders and the Louisiana Workforce Commission. State oversight and evaluation will make effective use of these means to identify obstacles and address them. The State will review applicable policies and procedures and modify them accordingly.

F. Process the Notice of Local Boards and Opportunity to Comment:

LDOL actively sought the input local Boards during the development of the waiver request. The waiver request was presented to the Workforce Commission for comment and approval during the April meeting.

- The representative(s) of community-based organizations is appointed from a list of up to three nominees, submitted jointly by area community-based organizations, including organizations representing people with disabilities and veterans.
- The representative(s) of economic development agencies is appointed from a list of up to three nominees, submitted jointly by area economic development agencies, including private sector economic development entities.
- Other individuals or representatives of entities that the chief elected official deems to be appropriate may also be appointed.

These representatives may serve in a capacity that enables one person to be responsible for multiple categories.

Louisiana is requesting a **waiver** to only require 1 representative of partners on LWIBs, also one representative from each of other required entities. WIA §117(b), 20 CFR §661.315(a) outlines the local workforce investment board membership requirements. These requirements result in large, unwieldy boards that experience difficulties conducting business. One reason for the large number of public sector members is the requirement that each local board must contain at least one member representing each one-stop partner. This has the potential to require 17 public and a matching 17 private sector members, before the other required members are factored in. The large number of public sector members is one of the reasons private sector members frequently do not attend meetings. The one-stop partners already meet as part of One-stop committees to discuss workforce development issues, coordination and organization as part of the MOU process. Louisiana is requesting a waiver of this requirement and instead allow each LWIB the option to allow the required one-stop partners to select one member to represent the coalition on the LWIB. The impact of this waiver would be having smaller, more effective boards that make more efficient use of local workforce partner time and expertise.

Regional planning shall be a required activity of LWIBs within each designated labor market planning area so businesses will be able to deal with a single point of contact rather than multiple sites with different rules and forms and improve coordination with regional economic development partners. The Task Force on Workforce Competitiveness is exploring industry specific workforce development (or sector) approaches that target specific industries through intermediaries that coordinate worker and workplace solutions that benefit low-wage workers and the regional economy. Several LWIBs in the state are developing one stop business centers. LDOL is working with the Ouachita and Jefferson LWIAs to model these centers for replication in other parts of the state.

Some of the duties of the LWIBs, in partnership with the CEO, shall include:

- Development of local/regional plan
- Selection of the One-Stop operator
- Selection of Youth providers
- Identification of eligible training providers
- Program oversight

plan will be supported through partnerships established with Economic Development agencies to combine resources that will maximize business retention strategies.

Additionally, where feasible, Rapid Response coordinators will partner with local Community Action Agencies to provide supportive services to dislocated workers to enable workers to participate in reemployment activities. Rapid Response events are promoted through the local television and radio networks, local newspaper articles, brochures, on-site visits by Regional Business Liaisons, and presentations at business meetings and community job and education fairs.

E. Youth – state programs/services should take a comprehensive approach, including basic skills remediation, stay in or return to school, employment, internships, help with attaining H.S. diploma/GED, post-secondary vocational training, apprenticeships and enrollment in community and four year colleges.

- Describe state's strategy for providing comprehensive integrated services to eligible youth. Include any state requirements and activities to assist youth who have special needs/barriers to employment, including pregnant, parenting or disabled. Include how state will coordinate across state agencies responsible for workforce investment, foster care, education, human services, juvenile justice, and other relevant resources as part of the strategy
- Describe how coordination with job corps and other youth programs will occur
- How does state plan to utilize 10% to support state's vision for serving youth, including:
 - Utilizing funds to promote cross agency collaboration, demonstration of cross-cutting models of service delivery, development of new models of alternative education leading to employment or development of demand driven models with business working collaboratively with the workforce investment system and education partners to develop strategies for bringing these youth successful into workforce pipeline with the right skills
- Describe how state will in general meet Act's provisions regarding youth program design

Louisiana recognizes the important role the Youth Councils play in developing and coordinating quality youth programs. Having the expertise of youth advocates dedicated to providing quality services is key to enhanced program delivery. However, the mandated structured membership requirements in the WIA regulations impede the LWIBs ability to develop youth advisory teams that meet local industry needs. Issues related to structure, membership and quorums overwhelm the true purpose of the Youth Councils. In rural LWIAs, the Youth Council faces the same membership problems as the LWIBs. In some areas the same individuals are required on both the LWIB and the Youth Council making it difficult to recruit members. Often the required Youth Council members overseeing the RFP process for youth providers are the only youth service providers in the area creating a conflict of interest. The LWIBs need the flexibility to create youth teams that truly reflect their local area and involve the unique individuals needed to help create innovative solutions. Louisiana is requesting a **waiver** to make the youth council membership requirements optional for each LWIB, which is in line with WIA reauthorization. In return for this waiver, Louisiana will guarantee that each LWIB has a mechanism in place to gather input and link the expertise of local youth advocates/program representatives with economic development, to develop strategies to provide the emerging workforce with the skills needed for high growth occupations, focused on business demands.

YOUTH ELIGIBILITY CRITERION

Each local workforce board will determine which youth, age 14-21, in their local area require additional assistance to complete an educational program or to secure and hold employment. This locally defined barrier will be defined in each local WIA plan as their sixth youth eligibility criterion and will be in addition to those defined in section 101(13)(C) including deficiency in basic literacy skills; school dropout; homeless, runaway, or a foster child;

pregnant or a parent; or an offender. Each local WIB will be required to include documentation supporting their decision.

Louisiana is requesting a **waiver** to provide flexibility in determining youth eligibility in order to enable LWIAs to attract a more diverse youth population particularly out of school youth and dropouts. The goal of the youth program is to assist youth facing serious barriers to employment successfully transition to adult roles and responsibilities; however, often the neediest youth are not necessarily the poorest youth. Currently, LWIAs spend considerable staff time documenting and determining income eligibility for the youth program. Often those youth the program is attempting to serve, particularly out-of-school youth, are the least capable of providing the specific documents the system requires. WIA has become more focused on income levels than specific barriers to successful youth development. In line with the proposed reauthorization, Louisiana is requesting a **waiver** to the current youth eligibility criteria. The system will use a three tier eligibility determination system: (1) allow signed self-attestation for family income to determine if family income is below poverty level. (2) accept eligibility determination for participants enrolled in other programs (to be determined by the state). The goal of WIA is to coordinate services among programs in order to leverage resources. Often WIA is unable to accept referrals from other programs, including community organizations, because the youth is not “poor enough” regardless of the number of life barriers the youth may possess. This would allow the state to better coordinate with the National Guard Youth Challenge, Job Corp and other programs to eliminate duplicative practices. (3) change the 5% window to 25%. Many youth needing assistance are not quite poor enough but face multiple educational/employment barriers. LDOL is working with the juvenile justice system to develop programs for youth reentering the community but often their family is just above the poverty line. Five percent of the participants served in a community is not large enough in many areas to handle the need.

Louisiana will provide comprehensive services to youth in accordance with Title I of WIA and with the vision, goals and emphasis areas outlined in section I of the State Plan. The youth system in Louisiana is closely aligned to the labor market and provides participants with a comprehensive set of service strategies. It is based on several key elements: integrated academic and vocational education; integrated work-based and classroom-based instruction; effective connections to intermediaries with strong links to the job market and employers; and intensive private-sector involvement. To achieve these goals, local youth councils have developed new collaborative that erase turf issues and bring together local workforce training providers, schools, community organizations and others to strategically align and leverage resources to create community youth assistance strategies that meet the particular needs of youth in their local regions. By working together, our local systems provide youth with skills that include a knowledge of the work world, academic skills linked to occupational learning, and both employability and attitudinal capabilities that will enable them to enter and advance in the job setting. LDOL is committed to meeting USDOL’s new strategic vision to serve out-of-school youth and at-risk youth. LDOL and the LWIAs will strive to spend 50% of the state’s PY05 youth allocation on the populations identified in Training Employment and Guidance Notice No. 3-04. The state’s proposed youth performance goals reflect this commitment to move from providing services to in-school youth and focus more resources on this difficult population.